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6 Attorneys for Plaintiffs-Relators

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **UNITED STATES OF AMERICA**
11 *ex rel.* **IONM LLC**, a Delaware
12 corporation and *ex rel.* **JUSTIN**
13 **CHEONGSIATMOY, M.D.; STATE**
14 **OF CALIFORNIA** *ex rel.* **IONM**
15 **LLC**, a Delaware corporation and *ex*
16 *rel.* **JUSTIN CHEONGSIATMOY,**
M.D.; LOS ANGELES COUNTY *ex*
rel. **IONM LLC**, a Delaware
corporation and *ex rel.* **JUSTIN**
CHEONGSIATMOY, M.D.; and
JUSTIN CHEONGSIATMOY,
M.D., in his individual capacity,

17 Plaintiffs,

18 v.

19 **UNIVERSITY OF SOUTHERN**
20 **CALIFORNIA**, a California
corporation,

21 and

22 **USC CARE MEDICAL GROUP,**
INC., a California corporation,

23 Defendants.
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Case No. 2:18-cv-08311-WLH (AS)

NOTICE THAT RELATOR HAS REQUESTED BUT HAS NOT RECEIVED WRITTEN CONSENT FROM **DAWYN HARRISON**, LOS ANGELES COUNTY COUNSEL; **ED MORRISSEY**, DIVISION CHIEF OF LOS ANGELES COUNTY HEALTH SERVICES; **MARC BEAART**, BUREAU DIRECTOR, LOS ANGELES COUNTY FRAUD & CORRUPTION; **SUSAN GILLIN**, BRANCH CHIEF FOR U.S. OIG HHS; **TOM MORRIS**; SENIOR TRIAL COUNSEL, U.S. DEPARTMENT OF JUSTICE; **MARTIN ESTRADA**, UNITED STATES ATTORNEY, CENTRAL DISTRICT OF CALIFORNIA, **FRANK D. KORTUM**, ASSISTANT UNITED STATES ATTORNEY; **BRIAN FRANKEL**, SUPERVISING DEPUTY ATTORNEY GENERAL; **JOHN FISHER**, DEPUTY ATTORNEY GENERAL; **NATHANIEL SPENCER-MORK**, ASSISTANT CHIEF COUNSEL, CDI; **MITCH NEUMEISTER**, CDI ATTORNEY TO DISCLOSE INFO TO DEFENDANTS INCL. BUT NOT LIMITED TO DAMAGES TO THE GOVERNMENTS, LAC CONTRACTS, ETC.

1 Plaintiff-Relators (Relator) hereby provide NOTICE that Relator has requested
2 but has not received written consent from **Dawyn Harrison**, Los Angeles County
3 Counsel; **Ed Morrissey**, Division Chief, Los Angeles County Health Services; **Marc**
4 **Beaart**, Bureau Director, Los Angeles County Fraud & Corruption; **Susan Gillin**,
5 Branch Chief for United States OIG HHS; **Tom Morris**, Senior Trial Counsel, U.S.
6 Department of Justice; **Martin Estrada**, United States Attorney, Central District of
7 California; **Frank D. Kortum**, Assistant United States Attorney; **Brian Frankel**,
8 Supervising Deputy Attorney General; **John Fisher**, Deputy Attorney General;
9 **Nathaniel Spencer-Mork**, Assistant Chief Counsel, CDI; and **Mitch Neumeister**,
10 CDI Attorney to disclose information to Defendants including but not limited to
11 damages to the Governments and damages to Los Angeles County through its
12 MSOA/MSAA/PSA contracts with Defendants, etc.

13 Dated: February 7, 2024

14 /s/ Alice Chang
15 Alice Chang, Attorneys for Plaintiff-Relators
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